

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

21-cr-10104 (PBS)

VLADISLAV KLYUSHIN,
a/k/a “Vladislav Kliushin”
IVAN ERMAKOV,
a/k/a “Ivan Yermakov,” and
NIKOLAI RUMIANTCEV,
a/k/a “Nikolay Rumyantsev,”

Defendants

JOINT MOTION TO SCHEDULE ORAL ARGUMENT

The Court having requested through its deputy clerk that the parties propose a date for oral argument on defendant’s motion to acquit, Docket No. 222, the United States of America and defendant Vladislav Klyushin respectfully propose that the Court hear argument on the motion at the Court’s convenience on either May 3 or May 5, 2023, pending the availability of a Russian-language interpreter.

Respectfully submitted,

VLADISLAV KLYUSHIN
Defendant

RACHAEL S. ROLLINS
United States Attorney

By: /s/Maksim Nemtsev
MAKSIM NENTSEV
MARC FERNICH
Counsel to Defendant Klyushin

By: /s/Seth B. Kosto
SETH B. KOSTO
STEPHEN E. FRANK
Assistant U.S. Attorneys

Date: April 11, 2023

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the parties' joint motion to schedule oral argument on defendant's Rule 29 motion will be served through Electronic Case Filing on counsel of records.

/s/Seth B. Kosto
SETH B. KOSTO
Assistant United States Attorney

April 11, 2023